



DEVIANT BEHAVIOR OF CRIMINALS: A CRITICAL ANALYSIS IN THE LIGHT OF LABELING THEORY

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ABSTRACT

"Deviance is not a quality of the act the person commits, but rather a consequence of the application by others of rules and sanctions to an "offender". The deviant is one to whom the label has successfully been applied; deviant behaviour is behaviour that people so label."

-Howard S. Becker

While society uses the stigmatic label to justify its condemnation, the deviant actor uses it to justify his actions. Becker wrote: "To put a complex argument in a few words: instead of the deviant motives leading to the deviant behaviour, it is the other way around, the deviant behaviour in time produces the deviant motivation."

The sociology of deviance faces two basic and interrelated problems: How and/or why some people engage in deviant acts. The meaning of these two problems, the nature of theories and research revolving around them, and their implications for the future direction of the sociology of deviance are explored. The goal is not to account for either social definitions or deviant behaviour, but rather to account for both and ultimately to specify the interaction and integrate explanations of behaviour and social definitions.

Although "stigma" has evolved as a remarkably widespread concept in the social sciences, the concept has almost never, as such, been subject to inquiry or overt definition, with the notable exception of Goffman's insights concerning it. In this paper I topicalize stigma in its use by social scientists and consider its utility in concrete social situations as organized by interactants. My central claim is that "stigma" has become under-defined and over-used. In making these points I examine two interrelated but distinct issues. The first of these concerns the "meaning" of stigma as exposed (almost always implicitly) in literature in sociology and other behavioural sciences. My goal here is to ascertain the discursive construction of stigma as a phenomenon that is amenable to study and especially to use as an interpretive and explanatory resource in social and behavioural sciences. As a second topic I consider by way of empirical demonstration they lived experience of persons who have what might be termed a "stigmatizing" condition - specifically, survivors of stroke - to address the paltriness of "stigma" as an omniscient summary of their circumstances.



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INTRODUCTION

The conflict criminologist, George Vold¹ reminded us some years ago that the phenomenon of crime involves two major dimensions—the behavioural and the definitional.² There is, therefore, always a dual problem of explanation, that of accounting for the behaviour as behaviour, and equally important, accounting for the definitions by which specific behaviour comes to be considered crime or non-crime.³ A growing number of criminologists have become aware of the two-sided nature of the problem and suggest that interest be turned increasingly to the study of and accounting for the contents of the criminal law. They have suggested that the legal norms defining certain behaviour as crime be subjected to analysis and explanations sought for why some acts are defined as crime and others are not.

One has even suggested that this constitutes the problem in the sociology of crime.⁴ While directly traceable to a conflict orientation,⁵ this newer emphasis on studying the law itself has also received major thrust from the theoretical issues raised by an interest in white-collar crime.⁶ The very differences between the set of laws regulating occupational behaviour⁷ and other statutes embodying legal proscriptions and sanctions have raised questions about how and why they were enacted, not just why they have been violated.⁸ The study of white-collar crime⁹, as Newman¹⁰ says, calls for the investigator ". . . to cast his analysis not only in the framework of those who break laws, but in the context of those who make laws as well." In a recent article, Gibbs notes that one of the major questions left unanswered by the "new" labelling conception of deviance is whether the ultimate goal is "to explain deviant behaviour or to explain reactions to deviations?"¹¹ A re-reading of the literature expounding this approach would suggest that the goal is not to account for either the behaviour or the reaction, but both. Thus, in a sense, the labelers have illuminated the twofold problem of explanation in the broader study of deviance just as conflict and white-collar crime¹² perspectives have done in the narrower field of criminology.

How and why certain kinds of behaviour and people get defined and labeled as deviant? How and why some people engage in deviant acts?

The explanation of deviant behaviour must address itself to two interrelated problems: (a) accounting for the group and structural variations in rates of deviancy, and (b) de-scribing and explaining the process by which individuals come to commit acts labeled deviant. Cressey, following Sutherland, refers to them as the problems of epidemiology and individual conduct.¹³ Some want to speak of them as the sociological and

¹ Larry J. Siegel, *Criminology: The Core*, Wadsworth Cengage Learning, 2008

² Pamela A. Roby, *POLITICS AND PROSTITUTION: A Case Study of the Revision, Enforcement, and Administration of the New York State Penal Laws on Prostitution*, 425(7 MAR 2006)

³ George Vold, *Theoretical Criminology*, New York: Oxford University Press, 1958

⁴ Austin Turk, "Prospects for Theories of Criminal Behaviour," *Journal of Criminal Law, Criminology, and Police Science*, 55 (December 1964), pp. 454-455; and "Conflict and Criminality," *American Sociological Reviews*, 31 (June 1966), pp. 338-352.

⁵ *Supra* note 3 at 203-241; Thorsten Sellin, *Culture Conflict and Crime* (New York: Social Science Research Council, 1938); and Richard C. Fuller, "Morals and the Criminal Law," *Journal of Criminal Law and Criminology*, 32 (1942), pp. 624-630.

⁶ S Shapiro, *Thinking About White Collar Crime - Matters of Conceptualization and Research*, Yale University Law School, 1980

⁷ Matsutsuyu, Janice, *Occupational behaviour: A perspective on work and play*, *American Journal of Occupational Therapy*, Vol. 25(6), Sep 1971, 291-294

⁸ Vilhelm Aubert, "White Collar Crime and Social Structure," *American Journal of Sociology*, 58 at 264 (1952)

⁹ *Supra* note 7

¹⁰ http://www.esr.ie/Vol39_2/02-Newman.pdf

¹¹ Jack P. Gibbs, "Conceptions of Deviant Behaviour: The Old and the New," *Pacific Sociological Review*, 9 (Spring 1966) at 14

¹² *Supra* note 7

¹³ Donald R. Cressey, "Epidemiology and Individual Conduct: A Case From Criminology," *Pacific Sociological Review*, 3 (Fall 1960), pp. 47-58



psychological "levels" of explanations.¹⁴ Reference to the two problems of behavioural explanation in these terms continues the old Durkheim¹⁵ a polemic designed to assure sociologists that they have a unique discipline. This polemic¹⁶ in intellectual imperialism is probably no longer meaningful or necessary; but if it is, it is not relevant to this distinction between structural and processual explanations of deviant behaviour, for both can be sociological.

The theoretical emphasis in the sociology of deviance¹⁷ has been on structural explanations, however, and we have some fairly sophisticated notions about the kinds of structures and environments which produce certain kinds of deviancy. But this emphasis should be balanced by an increased concern with the process by which these environments do so. Although there are excellent miniature theories of embezzlement,¹⁸ drug addiction, marihuana use, and check forgery, little recently has been done to reconstruct the process of coming to commit various kinds of deviant behaviour." Moreover, there have been virtually no efforts to locate the common elements in these separate explanations toward the end of testing or constructing a general processual theory.

Sutherland's differential association theory is notable for standing nearly alone as a general processual theory of criminal behaviour.¹⁹ Sutherland recognized that while theories addressed to structural and processual questions may be different, the two must be consistent.²⁰ Not only should they be consistent, but, as Cressey notes, they should be integrated.²¹ This integration is possible because in the final analysis both kinds of theory propose answers to the same overall question of why some people come to commit deviant acts and others do not. The structural theories²² contend that more people in certain groups, located in certain positions in, or encountering particular pressures created by the social structure, will engage in deviancy than those in other groups and locations. In a sense, they explain between-group variations. But in so doing, they implicitly or explicitly posit processes by which these structural conditions produce higher probabilities of deviancy. Processual theories²³ explain within-group variation. They say that the individual commits deviancy because he has encountered a particular life history. But in so doing, they are also saying something about the deviancy producing groups, structures, and circumstances he must encounter to increase the probability of his becoming and remaining deviant.

The differential association-reinforcement theory²⁴ formulated by Burgess and Akers avoids some of the problems of Sutherland's original formulation and describes the general process (consistently and integrally with a broader theory of behaviour) of deviant behaviour.²⁵ It is capable of identifying the common elements in the separate processual theories²⁶ and provides the groundwork for integrating structural and

¹⁴ Albert K. Cohen, "The Study of Social Disorganization and Deviant Behaviour," in Robert K. Merton, et al. (eds.), *Sociology Today* (New York: Basic Books, 1959), p. 461; *Deviance and Control* (Englewood Cliffs, New Jersey: Prentice-Hall, 1966), pp. 41-47; and "Review of Hermann Mannheim, *Comparative Criminology*," *Social Forces*, 45 (December 1966), pp. 298-299

¹⁵ Ivan Strenski, *Durkheim and the Jews of France*, University of Chicago Press, at 60

¹⁶ *Id.* at 60

¹⁷ *Id.*

¹⁸ *Supra* note 7

¹⁹ Edwin H. Sutherland and Donald R. Cressey, *Principles of Criminology* (6th ed.; Philadelphia: J. B. Lippincott, Co., 1960), pp. 77-79.

²⁰ *Id.* at 80

²¹ Donald R. Cressey, "The Theory of Differential Association: An Introduction," *Social Problems*, 8 (Summer 1960), p. 5.

²² <http://www.press.umich.edu/pdf/047211204X-ch9.pdf>

²³ By Ronald L. Akers and Christine S. Sellers, *Criminological Theories: Introduction, Evaluation, Application*, 5th ed. http://www.oup.com/us/pdf/crimtheories/Akers_Study_Guide.pdf; Marshall Barron Clinard, Robert F. Meier, *Sociology of Deviant Behaviour*, Wadsworth Cengage Learning, 2008.

²⁴ Ronald L. Akers, *Social Learning and Social Structure: A General Theory of Crime and Deviance*, Transaction publisher, 325

²⁵ Robert L. Burgess and Ronald L. Akers, "A Differential Association-Reinforcement Theory of Criminal Behaviour," *Social Problems*, 14 (Fall 1966), pp. 128-147.

²⁶ *Supra* note 29



processual explanations²⁷. By conceptualizing groups and social structure as learning environments which structure the patterns of associations and reinforcement²⁸, a long step is taken in the direction of bringing the two together. Differential association-reinforcement²⁹ spells out the mechanisms by which environmental stimuli produce and maintain behaviour and the structural theories³⁰ explicate the type of environments most likely to sustain norm and law-violating behaviour.

To test theories adequately, we need to utilize as broad a range of research techniques and as representative data as possible. This means that we must be more imaginative in ferreting out other sources of data beyond the usual official statistics, records, and populations of apprehended offenders to get a better idea of the distribution of rates of deviant behaviour. More precise knowledge of the behavioural process in deviancy not only awaits more systematic and extensive use of case histories and analytic inductive techniques, but requires greater utilization of laboratory experimentation. Reliable and valid techniques of studying delinquency in representative samples of the general adolescent population are being developed, and these could be extended into other fields. Of course, there is much yet to be done even in the restricted area of delinquency, and it could be argued that these techniques are simply inappropriate to some types of deviancy. But the spirit, if not the substance, of the developing technology of unofficial measures of delinquency could be applied to some adult violations. This could be combined with the utilization of official and semi-official compilations. We have not yet realized the full implications of the pioneering work of Sutherland³¹, Clinard, and Hartung on white-collar offenses³². There is a whole class of research sites of which we have thus far little availed ourselves—the files and records of private police, detective, security and similar agencies, insurance and management consultant firms, and business and occupational control boards and commissions. Also, we are just beginning to recognize the importance and potential impact on sociology of the very effective experimental technology developing in the operant conditioning tradition.³³

SOCIAL DEFINITIONS

In the broadest sense, the problem of explaining social definitions is that of accounting for why people come to have the values and norms they do. But more specifically the problem is to learn how the prevailing conceptions of what behaviour constitutes the major forms of deviancy in society have come to be established. This entails examining two related processes: (a) establishing the rules, definitions, norms, and laws the infraction of which constitutes deviance, and (b) reacting to people who have or are believed to have violated the norms by applying negative sanctions and labels to them (and applying deviant labels to others not because of their actions but because they possess some physical characteristic or disability). We are infinitely more knowledgeable about both the behavioural questions than either of these two aspects of the defining and labelling process.

Those criminologists who have given thought to the problem of why certain behaviour is defined as criminal offer explanations that converge on a group-conflict theme what becomes defined as illegal is related to the ability of certain groups in society to have their values, norms, and interests incorporated into or reflected in the law and its administration even against the interests of other groups and the general public.³⁴ Thus, they have been led to recognize the political nature of crime and a well-documented observation

²⁷ *Id.*

²⁸ *Supra* note 31

²⁹ *Id.*

³⁰ *Supra* note 27

³¹ Sutherland, *op. cit.*; Marshall B. Clinard, *The Black Market* (New York: Rinehart Co., 1952); and Frank Hartung, "White Collar Offenses in the Wholesale Meat Market Industry in Detroit," *American Journal of Sociology*, 56 (November 1950), pp. 325-342.

³² *Supra* note 7

³³ Robert L. Burgess and Ronald L. Akers, "Prospects for an Experimental Analysis in Criminology," paper read at the annual meeting of the American Sociological Association, August 1966

³⁴ Richard Quinney, "Crime in Political Perspective," pp. 19-21; *Supra* note 3, 4 at 207-209 Clinard, *The Black Market*, p. 153; and F. James Davis, et al., *Society and the Law* (New York: The Free Press of Glencoe, 1962), pp. 69-71



concerning politics in democratic society: the passage and content of nearly all laws, the formulation of nearly all public policy, and nearly every public decision, including court decisions, are in some measure the outcome of the direct or indirect political influence of competing interest groups.

Investigation of the political process by which the criminal label is established and applied remains a neglected area, however. What literature there is on this point has been largely suggestive and programmatic, with little in the way of research.³⁵ We will have to scrutinize more carefully the process by which the criminal law is formed and enforced in a search for those variables which determine what of the total range of behaviour becomes prohibited and which of the total range of norms become a part of the law. Certainly these variables would include not only the activities of political-interest groups but also a range of factors in the changing social, economic, political, and normative structures of society, its historical development, legal traditions, governmental forms, and the general political process.

It is the politically dominant subunits of society that at any given time can see to it that public policy reflects their interests, whether these be whole classes or segments, major vested interests, more specialized private groups, or even agencies of the government itself which exert influence in the law-making and enforcing processes. However, the law reflects not only the interests of particular segments but also the changing needs and functions of the whole society. The extent to which public policy is the result of the victories, compromises, and resolutions of group conflict is an empirical question that must be answered for the specific form of deviancy in question. Empirical research on this question may take the form of longitudinal or current study of some policy-in-the-making or historical reconstruction of the way the policy came into being. Such research is already available on theft law,³⁶ vagrancy law,³⁷ public policy on drugs,³⁸ prohibition,³⁹ and legal regulation of certain professional practices.⁴⁰ But the surface has just been scratched. The field is wide open for sociological research in the process of legislation, the content of laws, and the operation of administrative agencies, courts, police,⁴¹ and other agents of formal social control as well as the operation and function of private police and detectives as more informal enforcement agencies.

Conflict explanations and research into the degree to which group interests form a part of the total political process is only a start. If differences in the power of interest groups accounts for some differences in the laws and public policy, what makes for power?⁴² What differentials in organizational and other group properties account for differential political influence? Sociological theory has been nearly mute and systematic research almost nonexistent on this problem.⁴³

This type of research should be complemented by research into the variables operative in the defining and reacting to deviance by more informal social audiences than those connected with the formulation and implementation of the law. The significant theoretical problem here is the relationship between prevailing moral sentiments of the society and the normative stances incorporated into public policy. This concern with the overlap of current public opinion and the contents of the law is part of the old question of whether the law always flows from or can induce changes in the folk-ways and mores. The reasonable

³⁵ Turk, "Prospects for . . . Criminal Behaviour"; Richard Quinney, "Crime in Political Perspective," p. 19; Jeffery, "Structure of American Criminological Thinking," pp. 663-667; and Jeffery, "An In-tegral Theory of Crime and Criminal Behaviour," p. 534.

³⁶ Jerome Hall, *Theft Law and Society* (Indianapolis: The Bobbs-Merrill Co., 1952).

³⁷ William Chambliss, "A Sociological Analysis of the Law of Vagrancy," *Social Problems*, 12 (Summer 1964), pp. 67-77.

³⁸ Becker, *Outsiders*, pp. 135-146; Alfred R. Lindesmith, "Federal Law and Drug Addiction," *Social Problems*, 7 (Summer 1959), pp. 48-57.

³⁹ Peter Odegard, *Pressure Politics: The Story of the Antislavery League* (New York: Columbia University Press, 1928).

⁴⁰ Ronald L. Akers, "Professional Organization, Political Power, and Occupational Laws," unpublished Ph.D. dissertation, University of Kentucky, 1966.

⁴¹ Jerome Skolnick, *Justice Without Trial* (New York: John Wiley & Sons, 1966).

⁴² Truman, *op. cit.*, p. 13; Marian D. Irish and James W. Prothro, *The Politics of American Democracy* (Englewood Cliffs, New Jersey: Prentice-Hall, 1959), p. 336.

⁴³ Akers, "Professional Organization, Political Power and Occupational Laws."



answer, of course, is that law is both an independent and dependent variable in society, but research and theoretical perspectives are needed which define when and under what conditions it is one or the other.⁴⁴

Labeling and Deviant Behaviour

The professors of the labeling perspective contend that the important questions concerning deviancy are: Who applies the deviant label to whom? Whose rules shall prevail? Under what circumstances is the label successfully and unsuccessfully applied? How does a community decide what forms of conduct should be singled out for this kind of attention?⁴⁵ These kinds of questions do not exclude a concern with deviant behaviour, but they do give it secondary importance. One would expect, then, that this approach offers a valuable balance to exclusive concern with the causes of deviation and the characteristics of deviants. Indeed, some of the research alluded to above has been generated by this perspective. However, the theoretical contribution of this approach to the problem of social definitions has not been as great as its promise.

Today only the most unregenerate biological or constitutional determinist would quibble with the basic contention of this school that the deviant nature of acts resides not in the acts or the person committing them, but rather in group definitions and reactions. Certainly, it has been a long time since sociologists have said otherwise. It is true that in the past we have sometimes forgotten the basically social nature of deviance, and in an effort to untangle the etiology⁴⁶, we have become overly concerned with the conditions and characteristics of the deviants themselves. But this is just another way of saying that we have devoted most of our energy to the behavioural question and have implicitly accepted, as given, the established norms defining various kinds of behaviour as deviant. Nonetheless, this in no way implies that sociologists thought that there was something inherently evil or deviant about the behaviour itself. Not since Garofalo have we attempted to erect universal or natural categories of inherently criminal behaviour, and certainly since Durkheim⁴⁷ we have been cognizant of the centrality of social definitions to the conception of criminal and deviant behaviour. Yet, much of the effort expended by the writers in the labelling tradition has been to exorcise this nonexistent fallacy.

The labeling approach does rightly emphasize, neither wholly originally nor uniquely, the importance of studying social definitions and the process by which acts and people get labeled as deviant. But when labelling theorists have attempted to answer questions about social definitions, they say little more than what conflict theorists have been saying for some time, i.e., the dominant groups in society will have their norms and values prevail, will successfully apply their conceptions of who are the deviants and become more or less official definers of deviancy. In fact, the most sophisticated statement about the determinants of one type of labelling, "criminalization," is in a recent article written from an avowedly conflict perspective, not a stigma or labelling perspective.⁴⁸ Rather, although those of this school come dangerously close to saying that the actual behaviour is unimportant, their contribution to the study of deviancy comes precisely in their conception of the impact of labelling on behaviour. One sometimes gets the impression from reading this literature that people go about minding their own business, and then "wham" bad society comes along and slaps them with a stigmatized label. Forced into the role of deviant the individual has little choice but to be deviant. This is an exaggeration, of course, but such an image can be gained easily from an overemphasis on the impact of labelling.

However, it is exactly this image, toned down and made reasonable, which is the central contribution of the labelling school to the sociology of deviance. The stigmatization of deviance may have an impact such that the deviant comes to view himself as irrevocably deviant, becomes more committed to a deviant role, or becomes involved in deviant groups; this influences his future deviance and may force him to participate in

⁴⁴ William M. Evan, "Law as an Instrument of Social Change," *Estudio de Sociologia*, 2 (1962), pp. 167-175.

⁴⁵ Becker, *Outsiders*, pp. 1-18; Howard S. Becker (ed.), *The Other Side* (New York: The Free Press of Glencoe, 1964), p. 3; Kai T. Erikson, "Notes on the Sociology of Deviance," in Becker, *The Other Side*, p. 12

⁴⁶ *Etiology is the study of causation, or origination.*

⁴⁷ *Supra note 18*

⁴⁸ Turk, "Conflict and Criminality."



various kinds of secondary deviance. This perspective has also generated some ideas about what kinds of deviancy are likely to be affected in this way.⁴⁹

The labelling creates the deviance, yes, and often operates to increase the probability that certain stigmatized persons will commit future deviancy, and to promote deviant behaviour that might not have occurred otherwise. But the label does not create the behaviour in the first place. People can and do commit deviant acts because of the particular contingencies and circumstances in their lives, quite apart from or in combination with the labels others apply to them.⁵⁰ The labelling process is not completely arbitrary and unrelated to the behaviour of those detected and labeled. Although errors are made and criteria extraneous to behaviour are used, we do not react to others as homosexuals unless they exhibit behaviour believed to be indicative of homosexuality, and the courts do not stigmatize with the label of criminal until it has been legally determined that criminal acts have been committed. There were addicts loose in the land long before Anslinger and the Narcotics Bureau was let loose on the addicts. Obviously, the behaviour is not itself deviant; it is only because others have defined it so. But once defined, aside from questions of secondary deviations, the behaviour is prior to the labelling reaction. One may say that, in this sense, the behaviour creates the label.

CONCLUSIONS

The two major problems of accounting for behaviour and definitions are of equal importance, but both criminology and the broader field of the sociology of deviance have tended to give short shrift to explaining social definitions of deviancy. We have tended to see our job nearly exclusively as the study of those who break the laws and violate the norms. The time is here for increased theoretical and research interest in the making and enforcing of the laws and norms. Conflict theorists, those criminologists interested in white-collar crime⁵¹, and those in the labelling school of deviance have been more alert to the problem than have those operating from other perspectives. But we are in the beginning stage of mapping out the parameters and still know very little about the determining variables in the social defining and reacting process. To give more complete answers to the questions about deviant behaviour, increased attention needs to be turned to explicating the process by which individuals come to commit deviant acts, and eventually we must integrate processual and structural explanations. We are not likely to come up with a complete explanation of deviant behaviour in general until we tie it into a general theory of social behaviour. By the same token, the study of societal control of deviance must be tied to the larger study and theory of conflict, power, and norm formation and enforcement.

Bibliography

Books:

- i. Jacqueline B. Helfgott, *Criminal Behaviour Theories, Typologies, and Criminal Justice*, Sage Publication, 2008
- ii. David Canter, *Criminal Psychology*, Hodder Education, 2008
- iii. Roger Hopkins Burke, *An Introduction to Criminological Theory*, Willan Publishing, 2005
- iv. Ronald L. Akers, Christine S. Sellers, *Criminological Theories*, Rawat Publications, 4th ed. 2004
- v. Tim Newburn, *Key Readings in Criminology*, Willan Publishing, 2009

Journals:

- i. Richard V. Ericson, *Responsibility, Moral Relativity, and Response Ability: Some Implications of Deviance Theory for Criminal Justice*, *The University of Toronto Law Journal*, Vol. 25, No. 1 (Winter, 1975), pp. 23-41

⁴⁹ Schur, *Crimes Without Victim is*

⁵⁰ Lemert, *of course, does recognize this point and consistently maintains the distinction between primary and secondary deviance. Edwin Lemert, Human Deviance, Social Problems and Social Control (Englewood Cliffs, New Jersey: Prentice- Hall, 1967), pp. 40-64.*

⁵¹ Supra note 7



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- ii. John F. Manzo, On the Sociology and Social Organization of Stigma: Some Ethno methodological Insights, *Human Studies*, Vol. 27, No. 4 (2004), pp. 401-416Published
 - iii. Ronald L. Akers, Problems in the Sociology of Deviance: Social Definitions and Behavior, *Social Forces*, Vol. 46, No. 4 (Jun., 1968), pp. 455-465
 - iv. Penny J. Green and Tony Ward State Crime, Human Rights, And the Limits of Criminology Social Justice, Vol. 27, No. 1 (79), *Race, Class, and State Crime* (Spring 2000), pp. 101-115
 - v. Edward Sagarin and Fred Montanino, Anthologies and Readers on Deviance Contemporary Sociology, Vol. 5, No. 3 (May, 1976), pp. 259-267
 - vi. Joel S. Savishinsky, The Ambiguities of Alcohol: Deviance, Drinking and Meaning in a Canadian Native Community Anthropological, Vol. 33, No. 1/2, *The Anthropology of Deviance* (1991), pp. 81-98

Dictionary:

- i. Bryan A. Garner, *Black Law Dictionary*, 688 (West Publishing Co., 8th Ed. 2004)
-